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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

**SECOND SUPPLEMENTAL  
DECLARATION OF KENNETH JUE**

THIS DOCUMENT RELATES TO:  
ALL ACTIONS.

Date: July 9, 2015  
Time: 1:30 pm  
Courtroom: Room 8, 4th Floor  
Judge: Honorable Lucy H. Koh

1 I, Kenneth Jue, declare:

2 1. I am employed as a project manager by Gilardi & Co. LLC ("Gilardi"), located at 3301  
3 Kerner Blvd., San Rafael, California. Gilardi serves as the Court-appointed Settlement Administrator  
4 regarding the settlement with Defendants Adobe Systems Incorporated, Apple Inc., Google Inc., and  
5 Intel Corporation (collectively, the "Settling Defendants"), as set forth in the Settlement Agreement. As  
6 the case manager at Gilardi, I oversaw the administrative services provided. I have personal knowledge  
7 of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

8 2. To date, no Class Member has ever contacted Gilardi to request Class Counsel's  
9 Motion for Attorneys' Fees, Reimbursement of Expenses, and Service Awards ("Motion," Dkt.  
10 1075) or supporting papers. Had any asked to be provided with the Motion or supporting papers,  
11 or described difficulty in obtaining any publicly-filed document in this action, Gilardi would have  
12 provided it (just as Gilardi provided 56 Class Members with copies of the Notice when they asked  
13 for it, over the phone, by email, and / or by mail).

14 3. After seeing concerns expressed about access to the Motion for fees and  
15 supporting papers stated in in the objections submitted by Eric Veach and Mark Zavislak, I (at  
16 Class Counsel's request) posted the Motion, supporting papers, and related filings to the case-  
17 specific website on May 21, 2015 ([http://www.hightechemployeeelawsuit.com/case-](http://www.hightechemployeeelawsuit.com/case-documents.aspx)  
18 [documents.aspx](http://www.hightechemployeeelawsuit.com/case-documents.aspx)).

19  
20 I declare under penalty of perjury under the laws of the State of California that the  
21 foregoing is true and correct and that this declaration was executed this 29th day of June, 2015, at  
22 San Rafael, California.

23 /s/ Kenneth Jue  
Kenneth Jue